

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	
IN RE: Mathew Billet Duncan Rachel Marie Duncan Debtor(s)	:	Case Number: 17-00549 RNO
Toyota Motor Credit Corporation	:	
Movant	:	Chapter: 13
v.	:	
Mathew Billet Duncan Rachel Marie Duncan Debtor(s) and	:	
Charles J. DeHart, III Esq. Trustee	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, the Debtors by and through their attorney, Dawn M. Cutaia, file this Answer and in support thereof states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted in part; denied in part. It is admitted that Debtors are in default,

but it is denied that Movant lacks adequate protection. Debtors have properly cared for the vehicle. Debtors would like an opportunity to explore options with the lender on how they can keep the car.

9. This is a request for relief and therefore no response is required.

Respectfully Submitted:

/s/ Dawn M. Cutaia
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